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10 Attorneys for Defendant
11 CHICAGO TITLE INSURANCE COMPANY

12 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
13 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

14 Gary L. Compton, State Bar No. 1652
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15 Las Vegas, Nevada 89121

16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18
19 DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE FOR THE
20 CERTIFICATEHOLDERS OF THE
MORGANSTANLEY ABS CAPITAL I INC.
21 TRUST 2003-NC10 MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2003-
NC10,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

25 Defendants.

26 Case No.: 2:20-cv-02268-JCM-VCF

27
28 STIPULATION AND
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF No.
9] AND MOTION FOR FEES AND
COSTS [ECF No. 10]

(First Request)

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Deutsche
 2 Bank National Trust Company as Trustee for the Certificateholders of the Morgan Stanley ABS
 3 Capital I Inc. Trust 2003-NC10, Mortgage Pass-Through Certificates, Series 2003-NC10
 4 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby
 5 stipulate and agree as follows:

- 6 1. On December 15, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial
 7 District Court, Case No. A-20-826490-C [ECF No. 1-1];
- 8 2. On December 15, 2020, Chicago Title filed a Petition for Removal to this Court [ECF
 9 No. 1];
- 10 3. On January 14, 2021, Deutsche Bank filed a Motion for Remand [ECF No. 9];
- 11 4. On January 14, 2021, Deutsche Bank filed a Motion for Costs and Fees [ECF No. 10];
- 12 5. Chicago Title’s deadline to respond to Deutsche Bank’s Motion for Remand and
 13 Motion for Costs and Fees is currently January 28, 2021;
- 14 6. Chicago Title’s counsel is requesting an extension until Thursday, February 11, 2021,
 15 to file its response to the pending Motion for Remand and Motion for Costs and Fees;
- 16 7. Chicago Title requests a brief extension of time to respond to the Motion for Remand
 17 and Motion for Costs and Fees to afford Chicago Title additional time to respond to
 18 the legal arguments set forth in Deutsche Bank’s motions;
- 19 8. Deutsche Bank does not oppose the requested extension;
- 20 9. This is the first request for an extension which is made in good faith and not for
 21 purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Deutsche Bank's
2 Motion for Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10] is hereby extended
3 through and including February 11, 2021.

4

5 Dated: January 22, 2021

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

6

7 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
8 Attorneys for Defendant CHICAGO TITLE
9 INSURANCE COMPANY

10 Dated: January 22, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
12 Attorneys for Defendant CHICAGO TITLE
13 INSURANCE COMPANY

14 Dated: January 22, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
LINDSAY D. ROBBINS
16 Attorneys for Plaintiff DEUTSCHE BANK
17 TRUST COMPANY

18 **IT IS SO ORDERED:**

20 January 25, 2021
21 Dated: _____

By: Xenia C. Mahan
22 UNITED STATES JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden
D'METRIA BOLDEN
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP